NAHRGANG & ASSOCIATES, P.C.

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UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

:

IN RE: ARTHUR HERRING, III : NO. 20-12141

Debtor

: CHAPTER 7

NITV FEDERAL SERVICES, LLC

Plaintiff : NO. 20-180

VS.

:

:

ARTHUR HERRING, III :

Defendant :

DEFENDANT'S RESPONSE TO PLAINTIFFS MOTION FOR SUMMARY JUDGMENT

- 1. Admitted.
- 2. Denied to the extent that this allegation is inconsistent with the Florida complaint and the courts findings including its order dated December 16, 2019, and to the extent that the same contains conclusions of law.
- 3. Denied to the extent that this allegation is inconsistent with the Florida complaint and the courts findings including its order dated December 16, 2019, and to the extent that the same contains conclusions of law.
 - 4. Admitted.
 - 5. Denied as a conclusion of law.

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Answer to Motion for Summary Judgment

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6. Denied to the extent that this allegation is inconsistent with the Florida complaint and the courts findings including its order dated December 16, 2019, and to the extent that the same contains conclusions of law.

WHEREFORE, Defendant respectfully requests the Motion be denied.

Respectfully Submitted, /s/Matthew R. Nahrgang

Matthew R. Nahrgang, Attorney for Defendant